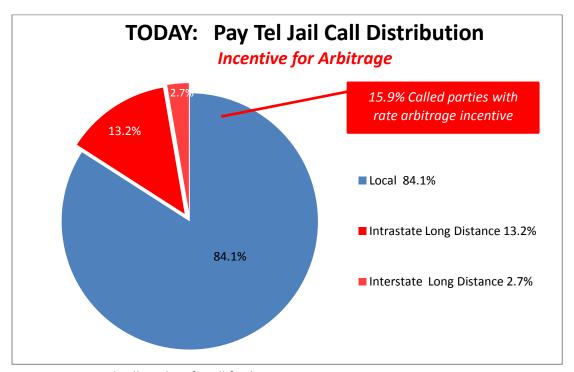
## **Inmate Calling Arbitrage**

This *ex parte* presentation provides further information supporting Pay Tel's concerns expressed in its submissions in this docket regarding the potential for rate arbitrage activity should the Commission adopt rates which provide an incentive to engage such activity.

Currently, a small portion of parties receiving long distance inmate phone calls from jails have a financial incentive to "shop" for a lower calling rate by obtaining a phone number local to the county jail (rate arbitrage.) Under the proposed interstate rate cap of \$0.07 per minute, the situation will be completely reversed, making rate arbitrage a significant issue for ICS vendors serving Jails going forward.



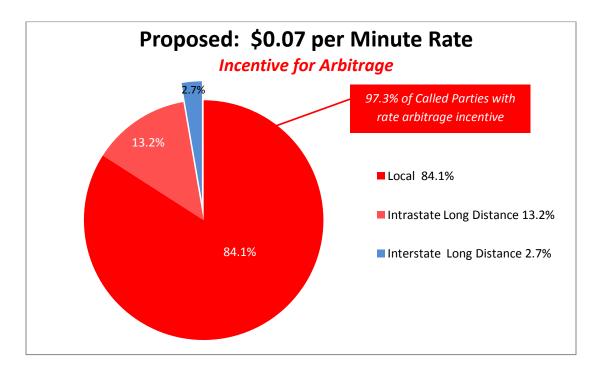
Source: Pay Tel calling data for all facilities

#### **Current Local Jail Market Facts:**

- Local call rates are (generally speaking) substantially lower than long distance rates
- 84.1% of calls placed from Jails are local calls (blue shaded section), with no incentive to "shop" for a lower rate
- Only 15.9% of Jail calls are placed to long distance called parties (red shaded sections), with incentive to obtain a local phone number in order to benefit from the much-lower local call rate

#### Scenario if the FCC Adopts the Proposed \$0.07 per Minute Interstate Rate:

- New rate capped Interstate rates will be substantially lower than local and intrastate long distance rates
- 2.7% of Jail calls will fall into this category (blue shaded section) with no incentive to "shop" for lower rates
- 97.3% of Jail calls (local and intrastate long distance in red shaded sections) will have tremendous incentive to obtain an interstate phone number in order to benefit from the absence of a per call surcharge and the much lower \$0.07 per minute interstate rate
- For a fifteen minute call, the proposed \$0.07 rate is substantially lower than the lowest local call rate cap or intrastate long distance rate in any state today<sup>1</sup>.



In addition to the obvious potential financial impact of wide-spread rate arbitrage; this activity presents a significant security concern. In particular, if a called party has obtained an interstate phone number just to obtain lower rates, the facility will no longer have accurate information as to the location of that party.

<sup>&</sup>lt;sup>1</sup> See attached 50 State Rate Chart for Local, IntraLATA and InterLATA Calls

## How Significant is the Potential Arbitrage Problem for County Jails?

According to the Bureau of Justice Statistics data, local Jails processed 11.6 million admissions last year<sup>2</sup>.

	Arbitrage Potential									
Description	Today	<b>Under Proposed Cap</b>								
Annual New Jail Inmate	11,600,000	11,600,000								
Admissions										
Inmates Booked and Released	3,828,000	3,828,000								
with Free Calls Only (33%)										
New Inmates Booked and	7,772,000	7,772,000								
Placing Revenue Phone Calls										
(67%)										
Unique Called Numbers	38,860,000	38,860,000								
(New Inmates x 5)										
Percentage with Arbitrage	15.9%	97.3%								
Incentive										
Total Consumers with	6,178,740	37,810,780								
Arbitrage Incentive										

The potential for arbitrage is 6x greater under the proposed rate cap

\* \* \*

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<sup>&</sup>lt;sup>2</sup> Bureau of Justice Statistics - Jail Inmates at Midyear 2012 - Statistical Tables, Page 4 (attached).

U.S. Department of Justice

Office of Justice Programs Bureau of Justice Statistics



May 2013, NCJ 241264

# Jail Inmates at Midyear 2012 - Statistical Tables

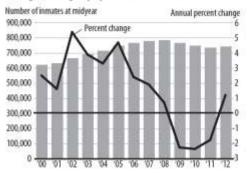
Todd D. Minton, BJS Statistician

fter three consecutive years of decline in the jail inmate population, the number of persons confined in county and city jails (744,524) increased by 1.2% (or 8,923 inmates) between midyear 2011 and midyear 2012 (figure 1, table 1). The majority of the increase occurred in California jails. Excluding the increase in California's jail population, the nationwide jail population would have remained relatively stable during the period. (For more information on California, see the text box on page 2.)

The average daily population (ADP) in jails remained stable from 735,565 during the 12-month period ending June 30, 2011, and 735,983 during the 12-month period ending June 30, 2012. The jail incarceration rate—the confined population per 100,000 U.S. residents—remained stable between 2011 (236 per 100,000) and 2012 (237 per 100,000). The incarceration rate was down from a high of 259 jail inmates per 100,000 residents in 2007.

Overall, males accounted for 87% of the jail population at midyear 2012 (tables 2 and 3). Whites accounted for 46% of the total, blacks represented 37%, and Hispanics represented 15% of inmates. About 5,400 juveniles were held in local jails (or less than 1% of the confined population). At midyear 2012, about 6 in 10 inmates were not convicted, but were in jail awaiting court action on a current charge—a rate unchanged since 2005. About 4 in 10 inmates were sentenced offenders or convicted offenders awaiting sentencing,

#### FIGURE 1 Inmates confined in local jails at midyear and percent change in the jail population, 2000–2012



Source: Bureau of Justice Statistics, Annual Survey of Jails, midyear 2000–2004 and midyear 2006–2012, and the Census of Jail Inmates, midwear 2005.

#### The majority of the increase in the jail inmate population occurred in large jails

Nearly 91% of the increase in the confined population during 2012 occurred in the largest jail jurisdictions—those with an average daily population of more than 1,000 inmates (table 4). The largest jails held 48% of the jail population at midyear 2012, but accounted for less than 10% of all jail jurisdictions nationwide. The population declined in jail jurisdictions holding 500 to 999 inmates. The share of offenders in jail jurisdictions holding less than 500 inmates did not change significantly between 2011 and 2012, indicating that these jail jurisdictions had somewhat similar rates of increase in their population.

Jail jurisdictions holding between 100 and 249 inmates experienced the largest difference in change rates between rated capacity and the jail inmate population (figure 4). From midyear 2008 to 2012, these jail jurisdictions reported a 2.8% decline in their inmate custody population and a 21.6% increase in their rated capacity. The smallest jail jurisdictions, which held fewer than 50 inmates, reported the smallest difference between change in their inmate population (down 1.1%) and change in rated capacity (up 6.4%). With the exception of an increase in the inmate population for jail jurisdictions holding 50 to 99 inmates, all other jail jurisdictions experienced a decline in their midyear jail population and an increase in their rated capacity.

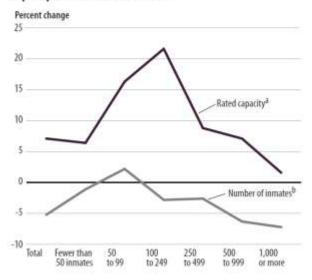
#### Local jails admitted 11.6 million persons during the 12-month period ending midyear 2012

Local jails admitted an estimated 11.6 million persons during the 12-month period ending June 30, 2012, which was similar to 2011 (11.8 million) and down from 13.6 million in 2008. The number of persons admitted in 2012 was about 16 times the size of the ADP (735,983) during the 12-month period between July 1, 2011 and June 30, 2012. (See Methodology for methods used to estimate admissions.)

Nearly 4 in 10 admissions during the last week of June 2012 were to the largest jail jurisdictions (table 7). Jail jurisdictions holding fewer than 50 inmates accounted for 7.2% of all jail admissions. The number of inmates admitted was about 35 times the size of the ADP between 2011 and 2012. These small jail jurisdictions also experienced the

highest turnover rate (131%). The turnover rate in large jail jurisdictions was 50%. Higher turnover rates mean larger numbers of admissions and releases relative to the size of the average daily population.

FIGURE 4
Percent change in the midyear custody population and rated capacity between 2008 and 2012



Note: Jurisdiction size is based on the average daily population (ADP) during the 12 months ending midyear 2006. ADP is the sum of all inmates in jail each day for a year, divided by the number of days in the year.

\*Maximum number of beds or inmates assigned by a rating official to a facility, excluding separate temporary holding areas.

<sup>b</sup>Number of inmates held on the last weekday in June.

Source: Bureau of Justice Statistics, Annual Survey of Jails, 2008 and 2012.

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TABLE 7
Average daily jail population, admissions, and turnover rate, by size of jurisdiction, week ending June 30, 2011 and 2012

	Av	erage daily popu	lation <sup>a</sup>	Estimated number during the last wee		Weekly turnover rate <sup>b</sup>			
Jurisdiction size <sup>c</sup>	2011	2012	Difference	2011	2012	2011	2012		
Total	735,565	735,983	418	226,944	222,565	61.4%	60.2%		
Fewer than 50 inmates	24,378	23,832	-546	15,217	15,987	125.8%	130.6%		
50 to 99	40,857	42,778	1,921	17,157	17,905	83.3	83.2		
100 to 249	91,212	89,957	-1,255	35,944	34,491	77.4	74.3		
250 to 499	100,567	100,487	-80	34,772	32,105	68.3	63.2		
500 to 999	126,099	122,837	-3,262	35,596	34,050	56.9	56.7		
1,000 or more	352,452	356,092	3,640	88,257	88,028	49.9	49.6		

Note: Detail may not sum to total due to rounding. See Methodology for more detail on estimation procedures.

TABLE 8
Inmate population in jail jurisdictions reporting on confined persons being held for U.S. Immigration and Customs Enforcement (ICE), midyear 2002–2012

	Jurisdictions reporting		Confined per	sons held for ICE at midyear
Year	on holdings for ICE <sup>a</sup>	Inmates confined at midyearb	Number	Percent of all inmates
2002	2,961	626,870	12,501	2.0%
2003	2,940	637,631	13,337	2.1
2004	2,962	673,807	14,120	2.1
2005	2,824	703,084	11,919	1.7
2006	2,784	698,108	13,598	1.9
2007	2,713	683,640	15,063	2.2
2008	2,699	704,278	20,785	3.0
2009	2,643	685,500	24,278	3.5
2010	2,531	622,954	21,607	3.5
2011	2,758	672,643	22,049	3.3
2012	2,716	690,337	22,870	3.3

<sup>\*</sup>Not all jurisdictions reported on holdings for ICE.

<sup>\*</sup>Sum of all inmates in jail each day for a year. Based on revised data for 2011.

<sup>&</sup>lt;sup>b</sup>Calculated by adding weekly admissions and releases, dividing by the average daily population and multiplying by 100. Based on revised data for 2011.

Based on the average daily population during the 12-month period ending June 30, 2006, the first year in the current Annual Survey of Jalls series.

Source: Bureau of Justice Statistics, Annual Survey of Jails, 2011-2012.

bNumber of inmates held on the last weekday in June.

Source: Bureau of Justice Statistics, Annual Survey of Jails, midyear 2002-2004 and midyear 2006-2012, and the 2005 Census of Jail Inmates.

### Rates for a 15 Minute Inmate Local Collect Call With Any State-Imposed Rate Ceilings.\*

Total Min. Initial Add'l \*RBOC rate used in absence of Cap

March 13, 2013

State	Rate Source	Applicable Local Call Rate		Collect Call		Add'l Inmate	To	tal Rate	Rate Cap	Rate Cap Details	
- Clair	Trace Course	LMC (if app)	Init. Min.	Add'l Min.		urcharge	Surcharge	. ັ	tui i tuto	Yes/No	Train out Details
Alabama	BellSouth	\$0.50	N/A	N/A	\$	2.25		\$	2.75	Yes	PSC Cap
Alaska		N/A	N/A	N/A	1	N/A		Ť	N/A	N/A	Inmate treated a CLEC
Arizona	Qwest	\$0.50		N/A	\$	1.45		\$	1.95	No	
Arkansas	SBC	N/A	N/A	N/A	\$	1.95	\$ 1.70	\$	3.65	No	
California	SBC	\$0.50	N/A	N/A	\$	1.50	\$ 1.70	\$	3.70	No	
Colorado	Qwest	\$0.50	N/A	N/A	\$	1.85		S	2.35	No	Deregulated as of June 6th, 2003.
Connecticut	SBC	\$0.50	N/A	N/A	\$	3.00		\$	3.50	No	
Delaware	Verizon	\$0.50	N/A	N/A	\$	1.75		\$	2.25	No	
Florida	BellSouth	\$0.50	N/A	N/A	\$	1.75		\$	2.25	No	Deregulated in 2011
Georgia	BellSouth	\$0.50	N/A	N/A	\$	2.20		\$	2.70	Yes	PSC Cap
Hawaii	Hawaiian Telcom	\$0.50	N/A	N/A	\$	1.20		\$	1.70	No	
Idaho	Qwest	\$0.50	N/A	N/A	\$	2.25		\$	2.75	No	
Illinois	SBC	N/A	\$ 0.1445	\$ 0.1275	\$	2.71		\$	4.64	No	Inmate is not subject to commission jurisdiction (Dkt 05-0429), 96-0131
Indiana	SBC	\$0.50	N/A	N/A	\$	3.00		\$	3.50	Yes	Capped at LEC
lowa	Qwest	\$0.74	N/A	N/A	\$	1.26		\$	2.00	No	No cap for Local Calls.
Kansas	SBC	N/A	N/A	N/A	\$	2.35	\$ 1.70	\$	4.05	No	
Kentucky	Bell South	\$0.50	N/A	N/A	\$	2.50		\$	3.00	No	
Louisiana	BellSouth	\$0.50	See Note	See Note	\$	0.81		\$	2.31	Yes	PUC rate cap \$.50/5 min. + Surhcarge
Maine	Verizon	N/A	\$ 0.1800	\$ 0.1400	\$	1.30		\$	3.44	No	
Maryland	Verizon	\$0.50	N/A	N/A	\$	0.60		\$	1.10	No	No Caps
Massachusetts	Verizon	N/A	\$ 0.1000	\$ 0.1000	\$	3.00		\$	4.50	Yes	Usage capped at LEC, surcharge is Commission imposed
Michigan	SBC	\$0.50	N/A	N/A	\$	3.95		\$	4.45	No	Benchmarks were repealed 1/1/06
Minnesota	Qwest	\$0.70	N/A	N/A	\$	1.30		\$	2.00	No	
Mississippi	BellSouth	\$0.50	N/A	N/A	\$	2.50		\$	3.00	Yes	Capped at BOC rate
Missouri	SBC	\$0.50	N/A	N/A	\$	0.81	\$ 1.70	\$	3.01	No	Rates reasonable if no higher than IXC which is not an AOS (e.g., AT&T, MCI, Sprint)
Montana	Qwest	N/A	\$ 0.6900	\$ 0.6900	\$	5.18		\$	15.53	Yes	Capped at commission benchmarks
Nebraska	Qwest	\$0.50	N/A	N/A	\$	3.75		\$	4.25	No	
Nevada	SBC	\$0.50	N/A	N/A	\$	1.00		\$	1.50	No	
New Hampshire	Verizon	\$0.50	N/A	N/A	\$	1.05		\$	1.55	Yes	Capped at Fairpoint's rates for similar services
New Jersey	Verizon	N/A	\$ 1.4900	\$ 1.4900	\$	5.25		\$	20.15	Yes	
New Mexico	Qwest	N/A	\$ 0.1500	\$ 0.1500	\$	1.00		\$	3.25	Yes	
New York	Verizon	N/A	\$ 0.1000	\$ 0.1000	\$	1.75		\$	3.25	No	
North Carolina	Concord	N/A	N/A	N/A	\$	1.71		\$	1.71	Yes	Capped at Windstream Concord Telephone Rate
North Dakota	Qwest	\$0.50	N/A	N/A	\$	4.99		\$	5.49	No	
Ohio	SBC	\$0.36	\$ 0.3600	N/A	\$	2.75		\$	8.15	Yes	PUC rate cap
Oklahoma	SBC	\$0.50	N/A	N/A	\$	1.65	\$ 1.70	\$	3.85	Yes	Capped max. rate of LEC or IXC
Oregon	Qwest	\$0.79	N/A	N/A	\$	1.95		\$	2.74	No	
Pennsylvania	Verizon	\$0.07	N/A	N/A	\$	1.75		\$	1.82	No	
Rhode Island	Verizon	N/A	\$ 0.2100	\$ 0.2100	\$	1.75		\$	4.90	No	PSC has allowed higher surcharges than the cap.
South Carolina	BellSouth	\$0.10	N/A	N/A	\$	2.50		\$	2.60	Yes	Only the surcharge is capped
South Dakota	Qwest	\$0.50	N/A	N/A	\$	2.10		\$	2.60	No	
Tennessee	BellSouth	\$0.50	N/A	N/A	\$	1.00		\$	1.50	Yes	No cap if carrier elects market regulation.
Texas	SBC	\$0.2975	\$ 0.2625	N/A	\$	3.75		\$	7.72	Yes	PUC rate cap
Utah	Qwest	\$0.50	N/A	N/A	\$	2.25		\$	2.75	No	
Vermont	Verizon	\$0.50	N/A	N/A	\$	1.65		\$	2.15	No	
Virginia	Verizon	\$0.50	N/A	N/A	\$	0.75		\$	1.25	No	Not regulated
Washington	Qwest	\$0.35	N/A	N/A	\$	1.39		\$	1.74	No	
West Virginia	Verizon	\$0.60	N/A	N/A	\$	2.15		\$	2.75	Yes	Only surcharge is Capped
Wisconsin	SBC	\$0.50	N/A	N/A	\$	3.95		\$	4.45	Yes	PSC Cap
Wyoming	Qwest	\$0.50	N/A	N/A	\$	3.75		\$	4.25	No	
Averages					\$	2.20	Rate:	\$	3.72		

#### Source: Technologies Management, Inc.

Technologies Management, Inc. (TMI) publications are not intended to be used in lieu of legal counsel or as the sole basis to determine a business strategy. Information contained herein is based upon tariff, price list, or similar rate filings or postings made by various telecommunications carriers. Those telecommunications carriers have not reviewed, acquiesced in or authorized any resulting summary or report. Other information is based upon relevant state statutes, and/or commission rules, orders, and telephone discussions with responsible state commission staff members. Tariffs and regulations change rapidly and accurate information, neither TMI nor the carriers are liable for errors, omissions or delays. While the information contained herein is considered by TMI to be generally reliable, it is not guaranteed.

## Rates for a 15 Minute IntraLATA (40 Mile) Long-Distance Inmate Collect Call.

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15 1 14 March 13, 2013

	State	Rate Source	Rate Cap										
				١.				_		Add'l Inmate		T	
			Yes/No		it. Min.		Add'l Min.		urcharge	St	ırcharge		tal Rate
1	Alabama	BellSouth	Yes	\$	0.3000	\$	0.3000	\$	2.25		-1-	\$	6.75
2	Alaska		N/A	· ·	-n/a-	· ·	-n/a-	r.	-n/a-		-n/a-	•	-n/a-
3		Qwest	No	\$	0.2500	\$	0.2500	\$	2.30	•	4.70	\$	6.05
4	Arkansas	SBC	No	\$	0.9000	\$	0.9000	\$	1.45	\$	1.70	\$	16.65
5	California	SBC	No	\$	0.1910	\$	0.1327	\$	1.50	\$	1.70	\$	5.25
6	Colorado	Qwest	No	\$	0.2000	\$	0.2000	\$	1.85			\$	4.85
7	Connecticut	SBC	No	\$	0.3900	\$	0.3900	\$	3.00			\$	8.85
8	Delaware	Verizon	No	\$	0.2000	\$	0.2000	\$	1.75			\$	4.75
9	Florida	BellSouth	No	\$ \$	0.4500	\$	0.4500	\$ \$	1.75 2.00			\$ \$	8.50 4.85
10		BellSouth	Yes	\$	0.1400	_	0.1900	\$	1.20			\$	3.30
11	Hawaii	Hawaiian Telcom	No	-		\$	0.1400	-				-	
12		Qwest	No	\$	0.3700	\$	0.3700	\$	2.25			\$	7.80
13		SBC	No	\$	0.1615	\$	0.1530	\$	2.71			\$	5.01
14		SBC	Yes	\$	0.4500	\$	0.4500	\$	3.00			\$	9.75
15		Qwest	Yes	\$	0.2500	\$	0.2500	\$	3.10	•	1.70	\$	6.85
16		SBC	No	\$	0.2100	\$	0.2100	\$	2.00	\$	1.70	\$	6.85
17	Kentucky	Bell South	No	\$	0.4000	\$	0.4000	\$	2.50			\$	8.50
18		BellSouth	Yes	\$	0.0500	\$	0.0500	\$	1.69			\$	2.44
19		Verizon	No	\$	0.4500	\$	0.3200	\$	1.30			\$	6.23
	Maryland	Verizon	No	\$	0.2800	\$	0.2200	\$	2.00			\$	5.36
21		Verizon	Yes	\$	0.1000	\$	0.1000	\$	3.00			\$	4.50
22		SBC	No	\$	0.5000	\$	0.5000	\$	3.95			\$	11.45
23		Qwest	No	\$	0.2300	\$	0.2300	\$	2.25			\$	5.70
24	- ''	BellSouth	Yes	\$	0.4000	\$	0.4000	\$	2.50			\$	8.50
25		SBC	No	\$	0.9000	\$	0.9000	\$	0.81	\$	1.70	\$	16.01
26		Qwest	Yes	\$	0.6900	\$	0.6900	\$	5.18			\$	15.53
27	Nebraska	Qwest	No	\$	0.1600	\$	0.1600	\$	3.75			\$	6.15
	Nevada	SBC	No	\$	0.9000	\$	0.9000	\$	1.00			\$	14.50
29		Verizon	Yes	\$	0.3500	\$	0.0058	\$	1.05			\$	6.27
30	,	Verizon	No	\$	0.2000	\$	0.2000	\$	2.00			\$	4.00
31	New Mexico	Qwest	Yes	\$	0.1500	\$	0.1500	\$	1.00			\$	3.25
32		Verizon	No	\$	0.2000	\$	0.2000	\$	1.75			\$	4.75
33		BellSouth	No	\$	0.3500	\$	0.3500	\$	2.50			\$	7.75
34		Qwest	No	\$	0.3000	\$	0.3000	\$	4.99			\$	9.49
35		SBC	Yes	\$	0.3600	\$	0.3600	\$	2.75		4.70	\$	8.15
36		SBC	Yes	\$	0.2500	\$	0.2500	\$	1.90	\$	1.70	\$	7.35
37	Oregon	Qwest	No	\$	0.1100	\$	0.1100	\$	1.95			\$	3.60
38		Verizon	No	\$	0.2600	\$	0.1600	\$	1.75			\$	4.25
	Rhode Island	Verizon	No	\$	0.2100	\$	0.2100	\$	1.75			\$	4.90
	South Carolina	BellSouth	Yes	\$	0.4000	\$	0.4000	\$	2.50			\$	8.50
	South Dakota	Qwest	No	\$	0.2900	\$	0.2900	\$	3.75			\$	8.10
	Tennessee	BellSouth	Yes	\$	0.2500	\$	0.2500	\$	0.50	•	4.70	\$	4.25
	Texas	SBC	Yes	\$	0.3325	\$	0.3150	\$	3.75	\$	1.70	\$	10.19
	Utah	Qwest	No	\$	0.1200	\$	0.1200	\$	2.25			\$	4.05
	Vermont	Verizon	No	\$	0.1600	\$	0.1600	\$	1.65			\$	4.05
	Virginia	Verizon	No	\$	0.3500	\$	0.3500	\$	2.75			\$	8.00
	Washington	Qwest	No	\$	0.5000	\$	0.5000	\$	0.50			\$	8.00
	West Virginia	Verizon	Yes	\$	0.6200	\$	0.4100	\$	2.15			\$	8.51
	Wisconsin	SBC	Yes	\$	0.4500	\$	0.4500	\$	3.95			\$	10.75
50	Wyoming	Qwest	No	\$	0.1500	\$	0.0800	\$	3.75			\$	5.02

Averages Surcharge: \$ 2.30 Rate: \$ 7.23

Source: Technologies Management, Inc.

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# Rates for a 15 Minute InterLATA (70 Mile) Long-Distance Inmate Collect Call.

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15 1 14 March 13, 2013

State	Rate Cap	AT&T Inmate/OSP Collect Rates or Capped Rates (70 Miles)											
	Yes/No		Init. Min.		Add'l Min.		Surcharge	Add	"I Inmate	т	otal Rate		
Alabama	Yes	\$	0.3000	\$	0.3000	\$	2.25	\$	-	\$	6.7		
Alaska	N/A	Ψ	-n/a-	- W	-n/a-	w .	-n/a-	\$		Ψ	-n/a-		
Arizona	No	\$	0.5200	\$	0.5200	S	2.30	\$		\$	10.1		
	No	\$		\$		\$	6.99	\$		\$	29.3		
Arkansas	No	\$	1.4900 1.4900	\$	1.4900	\$	6.99	\$		\$	29.3		
California		-		_	1.4900	-		-		-			
Colorado	No	\$	0.3000	\$	0.3000	\$	2.85	\$	-	\$	7.3		
Connecticut	No	\$	1.4900	\$	1.4900	\$	6.99	\$	-	\$	29.3		
Delaware	No	\$	1.4900	\$	1.4900	\$	6.99	\$	-	\$	29.3		
Florida	No	\$	0.5000	\$	0.5000	\$	2.75	\$	-	\$	10.2		
Georgia	Yes	\$	0.1900	\$	0.1900	\$	2.00	\$	-	\$	4.8		
Hawaii	No	\$	0.8900	\$	0.8900	\$	3.25	\$	-	\$	16.6		
Idaho	No	\$	1.4900	\$	1.4900	\$	6.99	\$	-	\$	29.3		
Illinois	No	\$	0.2700	\$	0.2700	\$	3.37	\$	-	\$	7.4		
Indiana	Yes	\$	1.4900	\$	1.4900	\$	6.99	\$	-	\$	29.3		
lowa	Yes	\$	1.4900	\$	1.4900	\$	6.99	\$	-	\$	29.3		
Kansas	No	\$	1.4900	\$	1.4900	\$	6.99	\$	-	\$	29.3		
Kentucky	No	\$	1.0900	\$	1.0900	\$	5.95	\$	-	\$	22.3		
Louisiana	Yes	\$	0.0500	\$	0.0500	\$	1.69	\$	-	\$	2.4		
Maine	No	\$	1.4900	\$	1.4900	\$	6.99	\$	-	\$	29.3		
Maryland	No	\$	1.4900	\$	1.4900	\$	6.99	\$	_	\$	29.3		
Massachusetts	Yes	\$	0.1000	\$	0.1000	\$	3.00	\$	-	\$	4.5		
Michigan	No	\$	1.4900	\$	1.4900	\$	6.99	\$		\$	29.3		
Minnesota	No	\$	1.4900	\$	1.4900	\$	6.99	\$	_	\$	29.3		
Mississippi	Yes	\$	1.3900	\$	1.3900	\$	5.25	\$	_	\$	26.1		
Missouri	No	\$	1.4900	\$	1.4900	\$	6.99	\$	_	\$	29.3		
Montana	Yes	\$	1.0200	\$	1.0200	\$	5.18	\$		\$	20.4		
Nebraska	No	\$	1.4900	\$	1.4900	\$	6.99	\$		\$	29.3		
Nevada	No	\$	1.4900	\$	1.4900	\$	6.99	\$		\$	29.3		
	Yes	\$	0.3500	\$	0.3500	\$	1.05	\$		\$	6.3		
New Hampshire	No	\$	1.4900	\$	1.4900	\$	5.25	\$		\$	20.1		
New Jersey		\$		\$		\$	1.00	\$		\$	3.2		
New Mexico	Yes	+	0.1500	_	0.1500	_		-	-				
New York	No	\$	1.3000	\$	1.3000	\$	6.99	\$	-	\$	26.4		
North Carolina	No	\$	1.4900	\$	1.4900	\$	6.99	\$	-	\$	29.3		
North Dakota	No	\$	1.4900	\$	1.4900	\$	6.99	\$	-	\$	29.3		
Ohio	Yes	\$	0.3600	\$	0.3600	\$	2.75	\$	-	\$	8.1		
Oklahoma	Yes	\$	1.0000	\$	1.0000	\$	5.25	\$	-	\$	20.2		
Oregon	No	\$	1.4900	\$	1.4900	\$	6.99	\$	-	\$	29.3		
Pennsylvania	No	\$	1.4900	\$	1.4900	\$	6.99	\$	-	\$	29.3		
Rhode Island	No	\$	1.4900	\$	1.4900	\$	6.99	\$	-	\$	29.3		
South Carolina	Yes	\$	1.2500	_	1.2500	\$	6.99	_	-	\$	25.7		
South Dakota	No	\$	1.4900	\$	1.4900	\$	6.99	\$	-	\$	29.3		
Tennessee	Yes	\$	1.4900	\$	1.4900	\$	6.99	\$	-	\$	29.3		
Texas	Yes	\$	0.3675	\$	0.3500	\$	3.75	\$	-	\$	9.0		
Utah	No	\$	1.4900	\$	1.4900	\$	6.99	\$	-	\$	29.3		
Vermont	Yes	\$	1.4900	\$	1.4900	\$	6.99	\$	-	\$	29.3		
Virginia	No	\$	1.4900	\$	1.4900	\$	6.99	\$	-	\$	29.3		
Washington	No	\$	0.5000	\$	0.5000	\$	0.50	\$	-	\$	8.0		
West Virginia	Yes	\$	0.7900	\$	0.7900	\$	2.15	\$		\$	14.0		
Wisconsin	Yes	\$	1.4900	\$	1.4900	\$	6.99	\$		\$	29.4		
Wyoming	No	\$	1.4900	\$	1.4900	\$	6.99	\$		\$	29.3		

Averages Surcharge: \$ 5.39 Rate \$ 13.67

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